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3	Telephone: (916) 857-6900 Fax: (916) 857-6902	
4	emimnaugh@pji.org Designated Resident Nevada Counsel for Defen	dants Woodhury and Rye
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6	jboppjr@aol.com Richard E. Coleson (IN Bar #11527-70)*	
7	rcoleson@bopplaw.com Joseph D. Maughon (VA Bar #87799)*	
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9	1 South Sixth St. Terre Haute, IN 47807-3510	
10	Telephone: (812) 232-2434 *Admitted pro hac vice. Counsel for Defendants Woodbury and Rye	
11		
12	DISTRICT	OF NEVADA
13	Planned Parenthood Mar Monte, Inc.,	
14	Plaintiff,	Case No.: 3:85-cv-00331-ART-CSD
15	v.	
16	Aaron D. Ford, Nevada Attorney Gen.; Christopher J. Hicks, Washoe County Dist.	JOINT MOTION FOR BRIEFING SCHEDULE AND PROPOSED ORDER
17	Attorney; Jason D. Woodbury, Carson City Dist. Attorney; Arthur E. Mallory, Churchill	
18	County Dist. Attorney; Steven Wolfson, Clark County Dist. Attorney; Mark B. Jackson,	
19	Douglas County Dist. Attorney; Tyler Ingram, Elko County Dist. Attorney; Robert E.	
20	Glennen, III, Esmeralda County Dist. Attorney; Theodore Beutel, Eureka County	
21	Dist. Attorney; Kevin Pasquale, Humboldt County Dist. Attorney; William E. Schaeffer,	
22	Lander County Dist. Attorney; Dylan V. Frehner, Lincoln County Dist. Attorney;	
23	Stephen B. Rye, Lyon County Dist. Attorney; T. Jaren Stanton, Mineral County Dist.	
24	Attorney; Brian T. Kunzi, Nye County Dist. Attorney; Bryce R. Shields, Pershing County	
25	Dist. Attorney; Anne Langer, Storey County Dist. Attorney; James S. Beecher, White Pine	
26	County Dist. Attorney,	
27	Defendants.	
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Pursuant to LR IA 6-2 and LR 7-1(c), Defendants Jason D. Woodbury, Carson City District Attorney, and Stephen B. Rye, Lyon County District Attorney (collectively, "Movant Defendants") and Plaintiff Planned Parenthood Mar Monte, Inc. ("PPMM"), by and through their respective counsel, respectfully submit the following joint motion and proposed scheduling order for briefing on Movant Defendants' Motion for Relief from Judgment, ECF No. 83 ("Motion").

Pursuant to the Court's March 19, 2024 Minute Order, ECF No. 105, counsel for Movant Defendants, PPMM, Attorney General Aaron Ford, Churchill County District Attorney Arthur E. Mallory, and Douglas County District Attorney Mark B. Jackson conferred via Zoom on April 18, 2024 to coordinate a briefing schedule, agreeing tentatively upon a scheduling order, pending coordination between Movant Defendants and PPMM to share docket items from the early stages of this case in Movant Defendants' possession. After review of the shared documents, on Thursday, May 16, 2024, counsel for Movant Defendants and PPMM, joined by counsel for Clark County District Attorney Steven B. Wolfson, met again and finalized the scheduling order agreement.

Accordingly, Movant Defendants and PPMM respectfully request that the Court grant this joint motion and enter a scheduling order as follows:

(1) PPMM shall file its response to the Motion within 21 days of the entry of the scheduling order; and

///

1	(2) Movant Defendants shall file their reply in support of the Motion within seven	
2	days of the day on which PPMM's response is due.	
3	Dated: May 22, 2024 Respectfully submitted,	
4	Emily C. Mimnaugh (NV Bar #15287)	
5	PACIFIC JUSTICE INSTITUTE, Nevada Office 1580 Grand Point Way #33171	
6	Reno, NV 89533 Designated Resident Nevada Counsel for Defendants Woodhyng and Pro-	
7	Defendants Woodbury and Rye By: _/s/ Joseph D. Maughon	
8	James Bopp, Jr. (IN Bar #2838-84)*	
9	Richard E. Coleson (IN Bar #11527-70)* Joseph D. Maughon (VA Bar #87799)*	
10	THE BOPP LAW FIRM, PC The National Building	
11	1 South Sixth St. Terre Haute, IN 47807-3510	
	*Admitted pro hac vice.	
12	Counsel for Defendants Woodbury and Rye	
13		
14	By: <u>/s/ Bradley S. Schrager</u> Bradley S. Schrager, Esq. (SBN 10217)	
15	Daniel Bravo, Esq. (SBN 13078) BRAVO SCHRAGER LLP	
16	6675 South Tenaya Way, Suite 200 Las Vegas, Nevada 89113	
17	Hannah Swanson, Esq. (admitted pro hac vice)	
18	PLANNED PARENTHOOD FEDERATION OF AMERICA	
19	1110 Vermont Ave NW, Suite 300	
20	Washington, DC 20005	
21	Valentina De Fex, Esq. (admitted pro hac vice)	
22	PLANNED PARENTHOOD FEDERATION OF AMERICA	
23	123 William Street, Floor 9 New York, New York 10038	
24	Attorneys for Planned Parenthood Mar Monte, Inc.	
25	ORDER	
26	Having considered the Movant Defendants' and PPMM's joint motion, this Court grants	
27	the joint motion and enters a scheduling order as follows:	
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1	(1) PPMM shall file its response to the Motion within 21 days of the entry of the	
2	scheduling order; and	
3	(2) Movant Defendants shall file their reply in support of the Motion within seven	
4	days of the day on which PPMM's response is due.	
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6	IT IS SO ORDERED:	
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8	UNITED STATES DISTRICT JUDGE	
9	DATED:	
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CERTIFICATE OF SERVICE I hereby certify that on this 22nd day of May, 2024, a true and correct copy of this **JOINT** MOTION FOR BRIEFING SCHEDULE AND PROPOSED ORDER was served via the United States District Court CM/ECF system on all parties or persons requiring notice. By /s/ Joseph D. Maughon Joseph D. Maughon (VA Bar #87799)*
jmaughon@bopplaw.com
THE BOPP LAW FIRM, PC
The National Building 1 South Sixth St. Terre Haute, IN 47807-3510
Telephone: (812) 232-2434
*Admitted pro hac vice.
Counsel for Defendants Woodbury and Rye